REMARKS

Applicants and Applicants' attorney express appreciation to the Examiner for the courtesies extended during the recent interview held on November 17, 2004. The amendments and arguments presented in this paper are consistent with the proposed amendments and arguments discussed during the Interview. Claims 1, 4-7, 9-14, 15, 17, 20-23, 25-30, 31-38, 39, 41-43 are pending, of which claims 1 and 15 are independent method claims, claim 31 is an independent computer program product claim, and claim 39 is an independent computer readable medium storing a data structure. As indicated above, claims 1, 15, 31, 39 and 41-43 have been amended by this paper[1] and claims 2-3, 8, 16, 18-19, 24, and 40 have been canceled without prejudice.[2]

The Office Action rejected the pending independent claims (1, 15, 31, and 39) under 35 U.S.C. § 102(b) as being anticipated by "Converting PC GUIs for NonPC Devices" by Johnson ("*Johnson*"); and rejected each of the remaining dependent claims under 35 U.S.C. § 102(b) as anticipated by *Johnson* or as unpatentable under 35 U.S.C. § 103(a) over *Johnson* in view of official notice taken by the Examiner.[3]

Applicants' invention, as claimed for example in independent method claim 1, relates to rendering data from a data server to create displayable content. The method includes a network server receiving a request for displayable content from a Web browser at a network device; identifying a template for the displayable content based on bandwidth available to send the displayable content to the network device, the template including one or more displayable portions that are natively compatible for viewing with the Web browser, one or more tokens representing non-displayable data that is stored on the data server and is not natively compatible for viewing with the Web browser, and one or more functions for converting the non-displayable data into a format that is natively compatible for viewing with the Web browser; retrieving the non-displayable data from the data server; using the identified template to construct the displayable content by: (i) including displayable portions in the displayable content as specified

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[1] Support for the amendments can be found throughout the Specification, and particularly beginning at line 21 of page 5 and beginning at line 5 of page 20.

[2] Applicants note that the subject matter of the canceled claims is covered by other pending claims and therefore canceling these claims does not evince an intent to surrender any subject matter.

[3] Although the prior art status of the cited art is not being challenged at this time, Applicants reserve the right to do so in the future. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status or asserted teachings of the cited art.

in the identified template; (ii) converting the non-displayable data retrieved from the data server using the one or more functions included within the identified template, into a format that is natively compatible for viewing with the Web browser; and (iii) including the converted data in the displayable content as specified in the identified template; and sending the displayable content to the network device.

Applicants' invention, as claimed for example in independent method claim 15, also relates to rendering data from a data server to create displayable content. The method includes a network server receiving a request for displayable content from a network device, the request indicating a Web browser type that is implemented on the network device; identifying a template for the displayable content based on bandwidth available to send the displayable content to the network device and the Web browser type, the template including one or more displayable portions that are natively compatible for viewing with the Web browser type implemented on the network device, one or more tokens representing non-displayable data that is stored on the data server and is not natively compatible for viewing with the Web browser type, and one or more functions for converting the non-displayable data into a format that is natively compatible fore viewing with the Web browser type; retrieving the non-displayable data from the data server; constructing the displayable content so as to represent both the displayable portions and the non-displayable data by using the one or more functions included within the identified template to convert the non-displayable data into a format that is natively compatible for viewing with the Web browser type implemented on the network device; and sending the displayable content to the network device.

Likewise, Applicants' invention, as claimed for example in independent computer program product claim 31, relates to rendering data from the data server to create displayable content. The computer product comprises a computer-readable medium carrying computer-readable instructions, that when executed at a network server, cause the network server to receive a request for content from a network device, the request indicating a Web browser type; identify a template for the requested content based on bandwidth available to send the displayable content to the first network device and the Web browser type, the template including displayable content that is natively compatible for viewing with the Web browser type, one or more tokens representing non-displayable data that is stored on the data server and is not natively compatible fore viewing with the Web browser type, and one or more functions for converting the

non-displayable data into a format that is natively compatible for viewing with the Web browser type; access the non-displayable data from the data server; follow the identified template for the requested content by: (i) including displayable content in the requested content as specified in the identified template; (ii) converting the non-displayable data accessed from the data server with the one or more functions specified by the identified template into a format that is natively compatible for viewing with the Web browser; and (iii) including the converted non-displayable content in the requested content as specified in the identified template; and sending the requested content to the network device.

Applicants' invention, as claimed for example in independent computer readable medium claim 39, relates to a data structure stored on the computer-readable medium, the data structure including compiled template data to be used by the program module, data structure comprising: a data dictionary data object that identifies data to be accessed from the data server that is not natively compatible for viewing with a particular Web browser; a template constant data object that identifies one or more constants associated with the template; a functions data object that identifies one or more functions associated with the template for converting the data that is not natively compatible for viewing with a particular Web browser into a format that is natively compatible for viewing with the particular Web browser; a token information table data object that identifies locations in the template associated with the data dictionary data object, the template constant data object, and the functions data object; and an HTML data object that identifies content associated with the template that is natively compatible for viewing with the particular Web browser.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP § 2131. That is, "for anticipation under 35 U.S.C. 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly." MPEP § 706.02. Applicants also note that "[i]n determining that quantum of prior art disclosure which is necessary to declare an applicant's invention 'not novel' or 'anticipated' within section 102, the stated test is whether a reference contains an 'enabling disclosure.'" MPEP § 2121.01. In other words, a cited reference must be enabled with respect to each claim limitation. During examination, the pending claims are given their broadest reasonable interpretation, *i.e.*, they are interpreted as broadly as their terms reasonably allow, consistent with the specification. MPEP §§ 2111 & 2111.01.

Johnson discloses a product known as Prism. *Johnson*, p. 40. Prism acts as a proxy server that receives requests for documents on behalf of clients and returns the appropriate content to the client. *Id.* Prism uses is own Web browser component to access the URL requested by a user. *Id.* Based on user preference data and stored devices characteristics, such as display resolution, color support, textual or graphical display, etc., Prism converts the URL's content into the best format for the user's device. *Id.*

Among other things, however, *Johnson* fails to teach, suggest, or enable, accessing or retrieving non-displayable data that is not natively compatible for viewing with a Web browser from a data server and converting the non-displayable data by using one or more functions included within an identified template, into a format that is natively compatible for viewing with the Web browser. *Johnson* also fails to teach, suggest, or enable, a data structure comprising a data dictionary data object that identifies data to be accessed from the data server that is not natively compatible for viewing with a particular Web browser and a functions data object that identifies one or more functions associated with the template for converting the data that is not natively compatible for viewing with a particular Web browser into a format that is natively compatible for viewing with the particular Web browser.
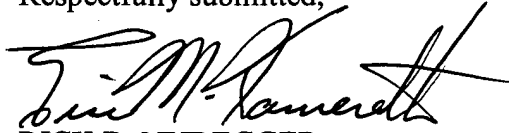
The Examiner seemed to concur with this analysis during the Interview and noted in the Interview Summary that Applicants proposed to amend the independent to differentiate over the prior art of record and that upon receiving the amendment, the Examiner will update the search.

Based on at least the foregoing reasons, therefore, Applicants respectfully submit that the cited art fails to anticipate or make obvious Applicants' invention, as claimed, for example, in independent claims 1, 15, 31, and 39. Applicants note for the record that the other rejections and assertions of record with respect to the independent and dependent claims are now moot, and therefore need not be addressed individually. Accordingly, Applicants do not acquiesce to any assertions in the Office Action that are not specifically addressed above, and hereby reserve the right to challenge those assertions in the future, including the official notice taken by the Examiner, if necessary or desired.

In the event that the Examiner finds any remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 4th day of January, 2005.

Respectfully submitted,

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